

**NEW YORK GATEWAY
CONNECTIONS IMPROVEMENT PROJECT
TO THE US PEACE BRIDGE PLAZA**

**Draft Design Report/Environmental
Impact Statement**

Draft Section 4(f) Evaluation (49 USC 303)

**APPENDIX G – PROJECT PLANNING
AND DEVELOPMENT - U.S. PLAZA
OF THE PEACE BRIDGE**

**PIN 5760.80
City of Buffalo
Erie County, New York**

November 15, 2013



U.S. Department of Transportation
Federal Highway Administration



New York State
Department of Transportation



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I. Introduction

The advancement of the NY Gateway Connections Improvement Project (hereafter referred to as the "Gateway Project"), independent of other transportation projects or activities in the area, addresses specific transportation needs associated with this international border crossing with Canada. This paper presents a basis for the following conclusions: 1) the project has independent utility; 2) the project serves a discrete purpose; and 3) the project does not restrict consideration of alternatives for other reasonably foreseeable Plaza improvements.

II. Purpose of the Project

The purpose of the Gateway Project is to reduce the use of the local streets by interstate traffic that accesses the existing U.S. Border Port of Entry/Peace Bridge Plaza (hereafter, "Plaza").

Realization of this project would accomplish the following objectives:

- Provide direct access from the Plaza to northbound I-190
- Redirect through traffic from Front Park
- Remove Baird Drive
- Replace the Porter Avenue Bridge over I-190 and the CSX Railroad

Simply put, the purpose of the Gateway Project is to keep interstate traffic on the interstate system and remove interstate bound cars and trucks from the local streets.

III. Interstate System Access Considerations

According to the U.S. Department of Transportation, in its *Interstate System Access Information Guide*, dated August, 2010, "The Interstate System was established for the movement of both military and civilian equipment, freight, and personnel over long distance between and within States...It is the FHWA's continuing responsibility to protect the structural and operational integrity of the Interstate System."¹ The FHWA guidance discourages partial interchanges, especially in the case of Interstate facility connections, and encourages system linkage and connectivity on National Highway System (NHS) facilities. Both the Peace Bridge and I-190 are on the NHS.





Related to access modification and interchanges the Guide states that:

- “The impact of access changes on the operation of the Interstate System are important; also of equal importance is the impact the changes will have on the system as a whole, the environment, potential economic development, the local street system, and safety both on and off the Interstate System.”²
 - The Gateway Project provides operational, environmental and economic advantages to the public traveling between the Interstate 190 (I-190) and the US Peace Bridge Plaza. The removal of the signalized intersection at the U.S. plaza will remove some of the driver confusion on the plaza and eliminate the stop and go traffic associated with a signalized intersection.
- “It is in the national interest to preserve and enhance the Interstate System to meet the needs of the 21st Century by assuring that it provides the highest level of service in terms of safety and mobility.”³
 - The Gateway Project improves both the safety and mobility for interstate traffic, as well as local traffic, by providing separation to the extent it is possible.
- “The FHWA’s interest is to ensure all new or revised access points: ...Support the intended purpose of the Interstate System.”⁴
 - The Gateway Project meets the purpose of the interstate system by providing direct access for international and interstate freight as well as passenger traffic.
- “All interchanges need to provide for each of the eight basic movements..., except in the most extreme circumstances. Partial interchanges usually have undesirable operation characteristics.”⁵
 - The Gateway Project eliminates the current partial interchange configuration.
- “Issues concerning partial interchanges. When partial interchanges (either system or service interchanges that do not provide for all possible interchanging movements between intersecting routes) are being considered as an alternative for a change in access, it is essential that coordination and development of alternatives begin during the early phases of the planning process. Not providing for all movements violates driver expectation and may lead to “wrong-way” movements on ramps.”⁶
 - One of the major issues with the current plaza ingress and egress is driver confusion. The Gateway Project provides for a single point of ingress to the U.S. Plaza and a single point of egress from the U.S. plaza, both on the west side of the plaza, thus meeting driver expectations.
- “Systems Linkage or Connectivity - ...The new or revised access should be such that it is compatible with the appropriate hierarchy of movement...and supports the role of the Interstate System as a thoroughfare for high-speed, high-volume, and long-haul travel, and not for local access between adjacent areas.”⁷
 - The Gateway Project removes international interstate traffic from local streets.
- “Issues with Partial Interchanges – Drivers have the expectation that when they exit the Interstate, they will be able to enter again, either to continue their journey in the same direction or





make the return trip. Partial system interchanges affect regional travel by forcing drivers who remain on the Interstate System to follow other corridors on their return journey and may take them many miles off course. Partial system interchanges also eliminate the opportunity to use alternate freeway corridors to maintain traffic operations during construction, traffic incidents, special events or emergencies.”⁸

- The Gateway Project provides a clearer ingress and egress pattern for both interstate traffic as well as local traffic entering or exiting the Plaza.

IV. Existing Highway Connections with the U.S. Peace Bridge Plaza

U.S. Plaza egress - Traveling from Canada to the United States:

The current system has only southbound I-190 direct interstate connectivity. Northbound I-190 access from the Plaza is via plaza crossing patterns on a small and congested plaza, through a signalized plaza intersection and Front Park. This pattern puts up to 300 vehicles per hour on Baird Drive which disrupts, and creates safety concerns, for the public use of Front Park.

U.S. Plaza ingress - Traveling to Canada from the United States:

The current system has only northbound I-190 direct interstate connectivity. Southbound I-190 access to the Plaza is via plaza crossing patterns, through a signalized plaza intersection and through Front Park. This pattern puts up to 440 vehicles per hour on Baird Drive which disrupts, and creates safety concerns, for the public use of Front Park.

V. Benefits of New Highway Connections with the U.S. Peace Bridge Plaza

The project provides for one point of U.S. Plaza ingress and one point of U.S. Plaza egress, both on the west side of the plaza, thus meeting driver expectations. It provides improved interstate highway connectivity from the U.S. Plaza to the I-190.

By removing interstate traffic from Front Park, 1.8 acres are converted to green space thereby reconnecting the 4.5 acres of parkland between Busti Avenue and Baird Drive with the remaining park to the west. The project also improves park access, provides for a safe area for passive and active recreation, reconnects severed pedestrian and bicycle pathways, moves interstate bound traffic away from the existing neighborhood and provides for an improved view-shed.

Removal of the traffic signal between the U.S. Plaza and Front Park eliminates intersecting traffic patterns, which create safety issues due to driver confusion; reduces opportunities for vehicle conflicts,





which improves overall safety for the traveling public; and minimizes vehicular idling while stopped at the signal.

The Gateway Project provides improvements that are independent and not connected to another action by another group or agency to allow them to be fully implemented and achieve their intended purpose and objectives.

VI. Other Projects Affecting the U.S. Plaza

It is recognized that other studies and projects are planned or are being pursued by different entities at this time to address various other needs.

The following projects are currently funded or about to be funded and are associated with the US Plaza:

- 1) Bridge widening along the throat area between the US Plaza and the Peace Bridge
- 2) Renovations of the PBA Customs Warehouse
- 3) Truck Pre-Inspection Pilot
- 4) Episcopal Church Home
- 5) Comprehensive traffic study and plaza operational optimization study on the U.S. Plaza
- 6) Re-decking of the Existing Peace Bridge

The projects and activities listed above are not connected to, nor are they dependent upon, the Gateway Project. They do not satisfy the purpose and need of the Gateway Project or the realization of its stated objectives. They can proceed prior to, currently or subsequent to the completion of the Gateway Project. These activities do not dictate the design configuration of the Gateway Project, nor do they prescribe the scope or location of the proposed interstate connections. Conversely, the Gateway Project does not influence, restrict or dictate the consideration of any of the above listed initiatives.

In addition, the Peace Bridge Authority previously conducted studies to evaluate operational, functional and security improvements with the goal to reduce congestion and improve overall efficiency and functionality of the existing Plaza. These studies have not resulted in a reasonably foreseeable project or action to modify the Plaza, nor are there any programmed activities to undertake such work. These studies, undertaken by the PBA, have shown that due to the physical constraints presented by the interstate highway to the west, Front Park to the south, and the orientation of the approach highway to the existing Peace Bridge to the north, there are limited reasonable options available to increase the size and / or configuration of the existing Plaza. If changes were to be advanced in the future, the orientation of these changes would most likely occur to the east of the existing plaza. As presented in the Gateway Project's Environmental Impact Statement, providing access improvements to and from the Plaza would occur to the west of the existing Plaza. Therefore, when built, the improvements implemented by the





Gateway Project will not need to be modified, reconfigured, or in any way changed to accommodate an increase in the size and / or configuration of the Plaza. The Gateway Connection project will be designed such that it will function efficiently and will not preclude ongoing or future improvements or expansion of the Plaza and related facilities.

The Gateway Project is not dependent upon the advancement of indefinite proposals or concepts to modify the Plaza that have been discussed or contemplated. The Gateway Project serves the discrete purpose and objectives related to direct access from the Plaza to Interstate 190, the removal of interstate traffic from local streets, and the replacement of the Porter Avenue Bridge over I-190 and CSX Railroad.

VII. Conclusion

The Gateway Project will accomplish the project purpose through access and egress from the plaza and local road improvements. The other projects referred to above, including any future modifications to the Plaza, do not dictate the geometrics and design of the Gateway Project. Should these projects occur after the Gateway project is built they will not require any modifications or changes to this project as built.

1. U.S. Department of Transportation, Federal Highway Administration, Office of Infrastructure, *Interstate System Access Informational Guide, dated August 2010*, Section 1.1, page 1, Introduction.
2. U.S. Department of Transportation, Federal Highway Administration, Office of Infrastructure, *Interstate System Access Informational Guide, dated August 2010*, Section 1.2, page 1, Purpose.
3. U.S. Department of Transportation, Federal Highway Administration, Office of Infrastructure, *Interstate System Access Informational Guide, dated August 2010*, Section 2.2, page 3, FHWA's Interest with Changes in Interstate System Access.
4. U.S. Department of Transportation, Federal Highway Administration, Office of Infrastructure, *Interstate System Access Informational Guide, dated August 2010*, Section 2.2, page 3, FHWA's Interest with Changes in Interstate System Access.
5. U.S. Department of Transportation, Federal Highway Administration, Office of Infrastructure, *Interstate System Access Informational Guide, dated August 2010*, Section 2.7, page 8, The Eight Policy Requirements.
6. U.S. Department of Transportation, Federal Highway Administration, Office of Infrastructure, *Interstate System Access Informational Guide, dated August 2010*, Section 3.3.4, page 18, Alternatives to be Considered.
7. U.S. Department of Transportation, Federal Highway Administration, Office of Infrastructure, *Interstate System Access Informational Guide, dated August 2010*, Section 3.6.1, page 22, Systems Linkage or Connectivity.
8. U.S. Department of Transportation, Federal Highway Administration, Office of Infrastructure, *Interstate System Access Informational Guide, dated August 2010*, Section 6.2.11, page 43, Issues with Partial Interchanges.





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